

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

LG. PHILIPS LCD CO., LTD.,

Plaintiff,

$$V_r$$

TATUNG COMPANY;  
TATUNG COMPANY OF AMERICA, INC.;  
CHUNGHWA PICTURE TUBES, LTD.;  
AND VIEWSONIC CORPORATION,

Defendants.

C.A. No. 05-292 (JJF)

## DEMAND FOR JURY TRIAL

## **DEFENDANTS' MOTION FOR LEAVE TO EXCEED PAGE LIMITATIONS**

Defendants Tatung Company, Tatung Company of America, Inc., Chungwa Picture Tubes, Ltd. and Viewsonic Corp. (collectively, “Defendants”) hereby request leave to file an opening brief not to exceed 60 pages and a reply brief not to exceed 30 pages in support of their renewed motion for judgment as a matter of law or in the alternative a new trial. In support of this motion, Defendants state as follows:

1. On July 21, 2006, and after Plaintiff closed its case-in-chief, Defendants moved pursuant to Fed. R. Civ. P. 50(a) for judgment as a matter of law. On July 26, 2006, Defendants again moved for judgment as a matter of law at the close of all evidence. Pursuant to the briefing schedule ordered by the Court, Defendants' post-trial motions and opening briefs are due on October 10, 2006. It is Defendants' present intention to file a renewed motion for judgment as a matter of law on October 10, 2006.<sup>1</sup> Defendants expect that they will need up to 60 pages to address adequately the issues raised therein.

<sup>1</sup> Defendants will also be filing post-trial motions pursuant to Rule 59 and otherwise, however, Defendants are not requesting any extension of page limits for such motions.

2. On September 27, 2006, Defendants requested that Plaintiff agree to a stipulation to extend the page limitations for Defendants' post-trial briefs. More specifically, Defendants proposed page limits of 60 pages (opening brief), 60 pages (answering brief) and 30 pages (reply brief). Plaintiff responded on September 29, 2006 rejecting the request and stating that Plaintiff does not "believe that extending the normal limits should be necessary or would be desirable". As a result, Defendants are compelled to seek leave of Court through this motion.

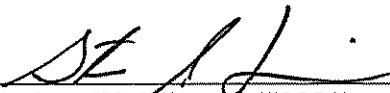
3. The evidence presented in this matter was voluminous and spanned the course of nine trial days. The trial transcript is 2284 pages long. In their opening brief in support of their Rule 50 motion, Defendants will raise substantive issues related to, *inter alia*, infringement and validity -- issues that cannot be presented fairly in 40 pages given the voluminous record.

For the foregoing reasons, Defendants respectfully request that the Court enter an order in the form attached hereto granting Defendants leave to file an opening brief not to exceed 60 and a reply brief not to exceed 30 pages in support of their motion for judgment as a matter of law.

OF COUNSEL:

Teresa M. Corbin  
Glenn W. Rhodes  
Howrey LLP  
525 Market Street, Suite 3600  
San Francisco, California 94105  
(415) 848-4900

Julie S. Gabler  
Howrey LLP  
550 South Hope Street, Suite 1100  
Los Angeles, California 90071  
(213) 892-1800



Robert W. Whetzel (#2288)  
whetzel@rlf.com  
Steven J. Fineman (#4025)  
fineman@rlf.com  
Matthew W. King (#4566)  
king@rlf.com  
Richards, Layton & Finger  
One Rodney Square, P.O. Box 551  
Wilmington, DE 19899  
(302) 651-7700  
Attorneys for Defendants/Counterclaimants  
Tatung Company, Tatung Company of  
America, Chunghwa Picture Tubes, Ltd, and  
Viewsonic Corporation

Dated: October 2, 2006

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

LG. PHILIPS LCD CO., LTD.,	)	
	)	
Plaintiff,	)	C.A. No. 05-292 (JJF)
	)	
v.	)	<b>DEMAND FOR JURY TRIAL</b>
	)	
TATUNG COMPANY;	)	
TATUNG COMPANY OF AMERICA, INC.;	)	
CHUNGHWA PICTURE TUBES, LTD.;	)	
AND VIEWSONIC CORPORATION,	)	
	)	
Defendants.	)	

**ORDER**

WHEREAS, Defendants Tatung Company, Tatung Company of America, Inc., Chungwa Picture Tubes, Ltd. and Viewsonic Corp. (collectively "Defendants") having moved this Court for an order for leave to file an opening brief not to exceed 60 pages and a reply brief not to exceed 30 pages in support of their motion for judgment as a matter of law ("Motion");

WHEREAS, good cause having been shown for the relief sought in the Motion;

IT IS HEREBY ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2006 that Defendants' Motion is GRANTED as follows:

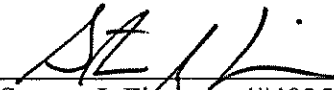
1. Defendants shall file an opening brief not to exceed 60 pages.
2. Plaintiff shall file an answering brief not to exceed 60 pages.
3. Defendants shall file a reply brief not to exceed 30 pages.

---

United States District Judge

**CERTIFICATION PURSUANT TO  
DISTRICT OF DELAWARE LOCAL RULE 7.1.1**

Counsel for Defendants has made reasonable efforts to consult with counsel for Plaintiff pursuant to District of Delaware Local Rule 7.1.1 concerning the subject matter of the attached motion and no agreement was reached.

  
\_\_\_\_\_  
Steven J. Fineman (#4025)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**


**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on October 2, 2006, I electronically filed the foregoing document with the Clerk of Court using CM/ECF which will send notification of such filing, and hand delivered to the following:

Richard D. Kirk  
The Bayard Firm  
222 Delaware Avenue, Suite 900  
P.O. Box 25130  
Wilmington, DE 19899

I hereby certify that on October 2, 2006, I sent the foregoing document by Electronic Mail, to the following non-registered participants:

Gaspare J. Bono  
Matthew T. Bailey  
Andrew J. Park  
Adrian Mollo  
McKenna Long & Aldridge LLP  
1900 K Street, NW  
Washington, DC 20006

  
Steven J. Fineman (#4025)  
fineman@rlf.com  
Richards, Layton & Finger  
One Rodney Square  
P.O. Box 551  
Wilmington, DE 19899